

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LAURA MAIETTA and
WESLEY WILSON III

Plaintiffs,

VS.

C.R. BARD, INC., a foreign Corporation, and BARD PERIPHERAL VASCULAR INC.

Defendants

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NO: 2:19-CV-04170-MMB

JUDGE: MICHAEL M. BAYLSON

PLAINTIFF'S AMENDED TRIAL EXHIBIT LIST

Exhibit #	Description	Bates #	Witness	Introduced	Objection	Admitted
<u>PLEADINGS</u>						
1	Plaintiffs' 2 nd Amended Short Form Complaint [11/30/16]			May Use		
<u>MEDICAL RECORDS</u>						
2	Hahnemann University Medical Center <ul style="list-style-type: none"> 9/30/03 Admitting Face Sheet [Tortella Depo Ex. 2] 		Bartholomew Tortella, MD [Implanting Physician]	Will Use		
3	<ul style="list-style-type: none"> 9/30/03 Admission Note [Tortella Depo Ex. 2] 					

4	<ul style="list-style-type: none"> 9/30/03 Final Radiology Report [Ankle, CT Abdomen, (Tortella Depo Ex.2)] 		Darren Hurst, MD [Operative Report] Derrek Muehrcke, MD [Operative Report]			
5	<ul style="list-style-type: none"> 9/30/03 MRI Spine [Tortella Depo. Ex.2] 					
6	<ul style="list-style-type: none"> Consultation Request [Tortella Depo Ex. 2] 					
7	<ul style="list-style-type: none"> 10/3/03 Operative Report [Tortella Depo Ex. 2 & Depo Ex. 3] 					
8	<ul style="list-style-type: none"> Manufacturer Sticker [Tortella Depo. 2] 					
9	<ul style="list-style-type: none"> Surgical/Procedure Consent Form (signed by mother) [Tortella Depo Ex. 4] 					
10	<ul style="list-style-type: none"> 10/16/03 Discharge Summary [Tortella Depo Ex. 2] 					
11	Phoenixville Hospital <ul style="list-style-type: none"> 12/20/13 ED Medical Record 		John M. Egan, DO [Treating Physician] Darren Hurst, MD Derrek Muehrcke, MD John Schaefer, MD	Will Use		
12	<ul style="list-style-type: none"> 4/15/14 ED Medical Record 					
13	<ul style="list-style-type: none"> 7/13/14 ED Medical Record 					
14	<ul style="list-style-type: none"> 9/3/14 ED Medical Record 					
15	<ul style="list-style-type: none"> 1/5/15 ED Medical Record 					
16	<ul style="list-style-type: none"> 10/31/15 ED Medical Record 					
17	<ul style="list-style-type: none"> 3/11/16 ED Medical Record 					
18	<ul style="list-style-type: none"> 4/14/16 ED Medical Record 					
19	<ul style="list-style-type: none"> 4/26/16 ED Medical Record 					
20	<ul style="list-style-type: none"> 2/25/17 Lumbar Spine Radiology Report 					
21	Pottstown Memorial Medical Center <ul style="list-style-type: none"> 1/31/14 ED Medical Record [Laura's Depo Ex. 4] 		Laura Maietta	Will Use		
22	Community Health Systems <ul style="list-style-type: none"> 8/6/14 ED Medical Record [Laura's Depo Ex. 5] 		Laura Maietta	Will Use		
23	<ul style="list-style-type: none"> 12/28/14 ED Medical Record [Laura's Depo Ex. 7] 					

24	<ul style="list-style-type: none"> 3/2/15 ED Medical Record [Laura's Depo Ex. 8] 					
25	Einstein Healthcare Network <ul style="list-style-type: none"> 11/16/14 ED Medical Record [Laura's Depo Ex. 6] 					
26	University of PA Hospital <ul style="list-style-type: none"> 4/20/16 Surgical Evaluation 		Benjamin Jackson, MD [1 st attempt] Darren Hurst, MD Derreck Muehrcke, MD John Schaefer, MD	Will Use		
27	<ul style="list-style-type: none"> 5/3/16 Preoperative History and Physical record [Laura's Depo Ex. 9] 					
28	<ul style="list-style-type: none"> 5/3/16 Operative Report [Laura's Depo Ex. 10] 					
29	University of PA Hospital <ul style="list-style-type: none"> Consent for IVC filter removal form [Laura's Depo Ex. 11] 		S. William Stavropoulos, MD [2 nd attempt] Darren Hurst, MD Derrek Muehrcke, MD John Schaefer, MD	Will Use		
30	<ul style="list-style-type: none"> 11/29/16 Radiology Final Report [Procedure] 					
31	<ul style="list-style-type: none"> Letter to Benjamin Jackson, MD dated 11/30/15 [Laura's Depo Ex. 12] 					
32	Geisinger Holy Spirit <ul style="list-style-type: none"> 11/22/18 Infectious Disease Consult 		Ena Saini, MD [ID treating physician] Darren Hurst, MD Derreck Muehrcke, MD John Schaefer, MD	Will Use		
33	<ul style="list-style-type: none"> 11/23/18 MRI Report [Spine] 					
34	<ul style="list-style-type: none"> 11/21/18 CT Report [Abdomen/Pelvis] 					
35	<ul style="list-style-type: none"> 1/2/19 ED Note 					
36	<ul style="list-style-type: none"> 1/3/19 Infectious Disease Consult 					
37	<ul style="list-style-type: none"> 1/3/19 Emergency Medicine Note 					
38	<ul style="list-style-type: none"> 2/7/19 Infectious Disease Progress Note 					
39	Penn State Health Milton Hershey Medical Center <ul style="list-style-type: none"> 12/20/18 Outpatient Letter 		Frank C. Lynch, MD [Physician for follow up for retained IVC filter] John Schaefer, MD	Will Use		
40	<ul style="list-style-type: none"> 3/31/22 Outpatient Letter 					
41	<ul style="list-style-type: none"> 3/31/22 CT Abdomen/Pelvis Report 					

<u>MEDICAL RECORDS REVIEWED BY EXPERTS</u>						
42	Phoenixville Hospital Medical Records from October 2003 – April 2016 [see above]		Darren Hurst, MD	May Use		
43	University of PA Hospital Medical Records from October 16 – November 2016					
	• 5/3/16 Procedure Note					
44	• 11/29/16 Procedure Note					
45	• 2/25/17 Lumbar Spine Xray					
46	University of PA Hospital Diagnostic Radiology Report from April 2016 – November 2016					
47	Geisinger Holy Spirit Medical Records from November 18 – February 2019					
	• 11/21/18 ED Medical Record		Derek Muehrcke, MD	May Use		
48	• 11/22/18 Infectious Disease Consult					
49	• 12/20/18 Progress Note					
50	10/3/03 Operative Report of Implant of IVC filter [Hahnemann Hospital]					
51	Manufacturer Sticker					
52	Phoenixville Medical Records from March 2016 – April 14, 2016					
	University of Pennsylvania Hospital Medical Records					
	University of Pennsylvania Medical Records and Diagnostic Reports from					
53	• 4/21/16 CT Abdomen and Pelvis					
54	• 5/3/16 Chest x-ray					
55	• 10/6/16 Angiogram Abdomen and Pelvis					
56	• 11/29/16 Operative Report					
57	Geisinger Holy Spirit Medical Records					
58	Phoenixville Medical Records		John Schaefer, MD	May Use		
59	University of Pennsylvania Medical Records					
60	Geisinger Holy Spirit Medical Records					

61	Frank Lynch, MD Medical Records					
	Radiology Reports					
62	• 3/11/16 CT Abdomen and Pelvis					
63	• 4/14/16 CT Abdomen and Pelvis					
64	• 5/3/16 Chest x-ray					
65	• 11/29/16 IVC Filter Removal					
66	• 11/21/18 CT Chest, Abdomen and Pelvis					
<u>IMAGING</u>						
	Phoenixville Hospital		Darren Hurst, MD	May Use		
67	• 2/12/07 CT Abdomen and Pelvis w/ Contrast					
68	• 11/12/15 Ultrasound Abdomen					
69	• 3/11/16 CT Abdomen and Pelvis w/ and w/out Contrast					
70	• 4/14/16 Lumbar Spine XR					
71	• 4/14/16 CT Abdomen and Pelvis w/ Contrast					
72	• 2/25/17 Ultrasound Abdomen					
73	University of PA Hospital					
	• 9/16/16 Ultrasound Abdomen					
	Geisinger Holy Spirit					
74	• 11/21/18 CT Chest, Abdomen, and Pelvis w/ Contrast					
75	• 11/23/18 MRI Lumbar Spine					
76	• 11/26/18 Chest X-ray					
77	• 12/11/18 CT Abdomen and Pelvis w/ Contrast					
	Phoenixville Hospital		Derrek Muehrcke, MD	May Use		
78	• 3/11/16 CT Abdomen and Pelvis w/ and w/out Contrast					
79	• 4/14/16 Lumbar Spine					
80	• 4/14/16 CT Abdomen and Pelvis w/ Contrast					

81	University of PA Hospital					
82	• 4/21/16 CT Abdomen and Pelvis w/ Contrast					
83	• 4/20/16 KUB					
84	• 5/3/16 Chest x-ray					
85	• 10/16/16 CT Abdomen					
86	• 10/16/16 CT Abdomen and Pelvis					
87	• 10/29/16 IVC Filter Removal					
88	Geisinger Holy Spirit					
89	• 11/21/18 CT of Chest, Abdomen and Pelvis					
90	• 11/21/18 CT Guided drainage of fluid					
91	• 11/23/18 MRI Spine w/ out Contrast					
92	• 11/26/18 Chest X-ray					
93	• 12/11/18 CT Abdomen and Pelvis w/out contrast					
	• 1/2/19 CT Head					
	• 1/2/19 Brain MRI					
<u>DISCOVERY</u>						
94	C.R. Bard's Objections and Responses to Plaintiffs' First Set of Interrogatories to Defendant C.R. Bard, Inc.			Will Use		
95	• Representative marketing/training: Recovery® Filter [BPV-17-01-00007760 – PBV-17-01-00007763]					
96	• Representative marketing/training Recovery® Filter [BPV-17-01-00044693 – BPV-17-01-00044815]					
	• Representative marketing/training: Recovery® Filter and G2® [BPV-00059613 – BPV17-01-00059933]					

97	<ul style="list-style-type: none"> Representative marketing/training: Recovery® Filter and G2® [BPV-17-01-00060007 – BPV17-01-00060595] 					
98	<ul style="list-style-type: none"> Representative marketing/training: G2® [BPV-17-01-00061944 – BPV-17-01-00062024] 					
99	<ul style="list-style-type: none"> Representative marketing/training: Recovery Cone ® tracking and training and related documents [BPV-17-01-00062479 – BPV-17-01-00063119] 					
100	<ul style="list-style-type: none"> Representative marketing/training: Recovery® [BPV-17-01-00063120 – BPV-17-01-00063134] 					
101	<ul style="list-style-type: none"> Representative marketing/training: Recovery® [BPV-17-01-00064840 – BPV – 17-01-00064955] 					
102	<ul style="list-style-type: none"> Representative marketing/training: G2® [BPV-17-01-00116813 – BPV-17-01-0011639] 					
103	<ul style="list-style-type: none"> Representative marketing/training: G2® [BPV-17-01-126318 – BPV-17-01-00126341] 					
104	<ul style="list-style-type: none"> Representative marketing/training: G2® [BPV-17-01-00127265 – BPV-17-01-00127293] 					
105	<ul style="list-style-type: none"> Representative marketing/training: G2® Express [BPV-17-01-137449 – BPV-17-01-00137587] 					
106	<ul style="list-style-type: none"> Representative marketing/training: G2® and G2® Express [BPV-17-01-00137685- BPV-17-01-00137930] 					

107	<ul style="list-style-type: none"> Representative marketing/training: G2® Express [BPV-17-01-00140163 – BPV-17-0100140181] 					
108	<ul style="list-style-type: none"> Representative marketing/training: G2® Express [BPV-17-01-00142347 – BPV-17-0100142370] 					
109	<ul style="list-style-type: none"> Representative marketing/training: Eclipse™ [BPV-17-01-00142898 – BPV-17-01-00142904] 					
110	<ul style="list-style-type: none"> Representative marketing/training: Eclipse™ [BPV-17-01-00142907 – BPV 17-01-00142915] 					
111	<ul style="list-style-type: none"> Representative marketing/training: G2® Express [BPV-17-01-00142932 – BPV-17-01-00142937] 					
112	<ul style="list-style-type: none"> Representative marketing/training: G2®X [BPV-17-01-142982 – BPV-17-01-00142983] 					
113	<ul style="list-style-type: none"> Representative marketing/training: Eclipse™ [BPV-17-01-00144162 – BPV-17-01-00144166] 					
114	<ul style="list-style-type: none"> Representative marketing/training: G2®X [BPV-17-01-00144187 – BPV-17-01-00144188] 					
115	<ul style="list-style-type: none"> Representative marketing/training: G2® [BPV-17-0100144225 – BPV-17-01-00144228] 					
116	<ul style="list-style-type: none"> Representative marketing/training: G2® Express [BPV-17-01-00144245 – BPV-17-01-00144250] 					
117	<ul style="list-style-type: none"> Representative marketing/training: Snare Retrieval [BPV-17-01-00144314 – BPV-17-01-00144314] 					

118	<ul style="list-style-type: none"> Representative marketing/training: Recovery® [BPV-17-01-00144319 – BPV-17-01-00144320] 					
119	<ul style="list-style-type: none"> Representative marketing/training: Snare Filter [BPV-17-01-00147001 – BPV-17-01-00147002] 					
120	<ul style="list-style-type: none"> Representative marketing/training: Meridian™ [BPV-17-01-00151341 – BPV-17-01-00151472] 					
121	<ul style="list-style-type: none"> Representative marketing/training: IVC Filter Presentation. Apr.23.2010.Course.Phoenix [PBV-17-01-00161924 – BPC-17-01-00161971] 					
122	<ul style="list-style-type: none"> Various Videos (including training, animations, implantations) [BPV-17-01-00140182 – BPV-17-01-00140184] 					
123	<ul style="list-style-type: none"> Various Videos (including training, animations, implantations) [BPV-17-01-00116719 – BPV-17-01-00116741] 					
124	<ul style="list-style-type: none"> Representative marketing/training: Recovery® [BPV-17-01-00062028 – BPV-17-0100062031] 					
125	<ul style="list-style-type: none"> Representative marketing/training: Recovery® [BPV-17-01-00112935 – BPV-17-01-00112938] 					
126	<ul style="list-style-type: none"> Various Videos (including training, animations, implantation) [BPV-17-01-00144385 – BPV-17-01-00144525] 					
127	<ul style="list-style-type: none"> Various Videos (including training, animations, implantations) [BPV-17-01-00151337 – BPV-17-01-00151472] 					

128	<ul style="list-style-type: none"> Representative marketing/training: Meridian™ [BPVEFILTER-01-0004309 – BPVEFILTER-01-00043091] 					
129	<ul style="list-style-type: none"> Representative marketing/training: Meridian™ [BPVEFILTER-01-00043092 – BPVEFILTER-01-00043092] 					
130	<ul style="list-style-type: none"> Denali Materials – Representative marketing/training materials [BPV-17-01-00221709 – BPV-17-01-00221893] 					
131	<ul style="list-style-type: none"> Various Marketing, Sales, and Training material for all filters (orange folder process) [BPV-17-01-00238854 – BPV-17-01-00261341] 					
132	<ul style="list-style-type: none"> Representative marketing/training: G2 [BPV-17-01-00142988 – BPV-17-01-00142994] 					
133	<ul style="list-style-type: none"> Representative marketing/training: Eclipse Vena Cava Filter [BPV-17-01-00142988 – BPV-17-01-00142994] 					
134	<ul style="list-style-type: none"> Representative marketing/training: G2 [BPV-17-01-00143000 – BPV-17-01-00143008] 					
135	Denali Materials – Representative Marketing/Training Materials [BPV-17-01-00221709 – BPV-17-01-00221893]					
<u>DEPOSITION TESTIMONY</u>						
136	Laura Maietta Deposition Transcript with Exhibits [10/2/20]		Laura Maietta	May Use Depo Transcript		
137	<ul style="list-style-type: none"> Ex. 1. Plaintiff Profile Form 					
138	<ul style="list-style-type: none"> Ex. 2. Procedure Consent Form [signed by mother] 			Will Use Exhibits		
139	<ul style="list-style-type: none"> Ex. 3. Hahnemann Discharge Summary 					
140	<ul style="list-style-type: none"> Ex. 4. 1/31/14 Physician Summary Report [Pottstown MMC] 					

141	<ul style="list-style-type: none"> Ex. 5. 8/6/14 Medical Record [Community Health] 					
142	<ul style="list-style-type: none"> Ex. 6. 11/16/14 ED Medical Record [Einstein] 					
143	<ul style="list-style-type: none"> Ex. 7. 12/28/14 Medical Record [Community Health] 					
144	<ul style="list-style-type: none"> Ex. 8. 3/2/15 Medical Record [Community Health] 					
145	<ul style="list-style-type: none"> Ex. 9. 4/20/16 Medical Record [Benjamin Jackson H & P] 					
146	<ul style="list-style-type: none"> Ex. 10. 5/3/16 Operative Report [B. Jackson] 					
147	<ul style="list-style-type: none"> Ex. 11. 11/29/16 Medical Record [Consent for IVC removal] 					
148	<ul style="list-style-type: none"> Ex. 12. 11/30/16 Medical Record [Stavropoulos ltr to Jackson] 					
149	Wesley Wilson, III Deposition Transcript with Exhibits [12/4/20]		Wesley Wilson, III	May Use Depo Transcript		
150	<ul style="list-style-type: none"> Ex. 1. Notice of Deposition 			Will Use Exhibits		
151	<ul style="list-style-type: none"> Ex. 2. Plaintiff Profile Form 					
152	<ul style="list-style-type: none"> Ex. 3. 7/13/14 ED Medical Record 					
153	<ul style="list-style-type: none"> Ex. 4. 4/20/16 Medical Record 					
154	<ul style="list-style-type: none"> Ex. 5. Surgical/Procedure Consent Form 					
155	<ul style="list-style-type: none"> Ex. 6. 5/3/16 Operative Report 					
156	Bartholomew J. Tortella, MD Deposition Transcript with Exhibits [4/12/21]		Bartholomew J. Tortella, MD	Will Use Depo Transcript & Exhibits		
157	<ul style="list-style-type: none"> Ex. 1. CV 					
158	<ul style="list-style-type: none"> Ex. 2. Hahnemann Hospital Medical Records [9-30/03 - 10/16/03] 					
159	<ul style="list-style-type: none"> Ex. 3. Hahnemann Hospital Operative Report dated 10/3/03 					
160	<ul style="list-style-type: none"> Ex. 4. Surgical Procedure/Consent Form 					

161	<ul style="list-style-type: none"> Ex. 5. Recovery Filter system IFU [2003] [BPV-17-01-00000246 -BPV-17-01-00000248] 					
162	<ul style="list-style-type: none"> Ex. 6. Recovery Filter Compassionate Use dated 9/14/00 [BPV-17-01-00114165 – BPV-17-01-00114166] 					
163	<ul style="list-style-type: none"> Ex. 7. Health Hazard Evaluation dated 11/17/04 [BPV-17-01-00024118 – BPV-17-01-00024119] 					
164	<ul style="list-style-type: none"> Ex. 8. Email dated 2/27/04 re: Case for Caval Centering [BPV-01-00373887] 					
165	<ul style="list-style-type: none"> Ex. 9. Management of Fractured IVC Filter: Outcomes by Fragment Location [Article] 					
166	<ul style="list-style-type: none"> Ex. 10. Email dated 7/5/04 re: Maude Website discussion & key needs (highlighted) 					
167	<ul style="list-style-type: none"> Ex. 11. Crisis Plan email changed dated 4/15/04 (redacted) [BPV-17-01-00165419 – BPV-17-01-00165422]x 					
168	Ena Saini MD Deposition Transcript with Exhibits [4/2/21]		Ena Saini, MD	Will Use Depo Transcript & Exhibits		
169	<ul style="list-style-type: none"> Ex. 1. 11/22/18 Infectious Disease Consult 					
170	<ul style="list-style-type: none"> Ex. 2. 11/23/18 MRI T Spine Report 					
171	<ul style="list-style-type: none"> Ex. 3. 11/21/18 CT Abdomen / Pelvis Report 					
172	<ul style="list-style-type: none"> Ex. 5. 1/3/19 Infectious Disease Consult 					
173	<ul style="list-style-type: none"> Ex. 6. 2/7/19 Infectious Disease Progress Note 					
174	Darren Hurst, MD Deposition Transcript with Exhibits [07/26/21]		Darren Hurst, MD [Plaintiff's Vascular/Interventional Expert]	May Use Depo Transcript		
175	<ul style="list-style-type: none"> Ex. 1. Notice of Remote Videotaped Deposition 					
176	<ul style="list-style-type: none"> Ex. 2. Plaintiffs' Rule 26(a)(2) Expert Witness Disclosure [filed 6/29/21] 			Will Use Exhibits		

177	<ul style="list-style-type: none"> Ex. 3. Plaintiffs' Amended Rule 26(a)(2) Disclosure w/ COS by Laura [filed 7/19/21] 					
178	<ul style="list-style-type: none"> Ex. 4. Expert Report 					
179	<ul style="list-style-type: none"> Ex. 5. Appendix to Expert Report 					
180	<ul style="list-style-type: none"> Ex. 6. CV 					
181	<ul style="list-style-type: none"> Ex. 7. Rebuttal Report to Reichle's Report 					
182	<ul style="list-style-type: none"> Ex. 8. Bard Recovery IFU (Rev. 1 2003) 					
183	<ul style="list-style-type: none"> Ex. 9. Invoice for work performed 					
184	<ul style="list-style-type: none"> Ex. 11. Expert Report native file 					
185	<ul style="list-style-type: none"> Ex. 12. Bard Recovery Filter IFU dated 1/24/03 [BPV-17-01-00042651 – BPV-17-01-00042661] 					
186	Derek Muehrcke, MD Deposition Transcript with Exhibits [07/30/21]		Dr. Derek Muehrcke [Plaintiffs' Cardiothoracic Surgeon Expert]	May Use Depo Transcript Will Use Exhibits		
187	<ul style="list-style-type: none"> Ex. 1. Notice of Remote Videotaped Deposition 					
188	<ul style="list-style-type: none"> Ex. 2. Plaintiffs' Rule 26(a)(2) Expert Witness Disclosure [filed 6/29/21] 					
189	<ul style="list-style-type: none"> Ex. 3. Expert Report [Amended] 					
190	<ul style="list-style-type: none"> Ex. 4. CV 					
191	<ul style="list-style-type: none"> Ex. 5. Rebuttal Report to Reichle's Report 					
192	<ul style="list-style-type: none"> Ex. 6. Bard Recovery Filter IFU dated 1/24/03 [BPV-17-01-00042651 – BPV-17-01-00042661] 					
193	<ul style="list-style-type: none"> Ex. 8. PowerPoint 					
194	<ul style="list-style-type: none"> Ex. 9. PowerPoint 					
195	<ul style="list-style-type: none"> Ex. 10. Billing information 					
196	<ul style="list-style-type: none"> Ex. 11. Deposition experience 					
197	<ul style="list-style-type: none"> Ex. 12. Reports read 					
198	<ul style="list-style-type: none"> Ex. 13. Appendix A, articles reviewed 					

199	John Schaefer, MD Deposition Transcript with Exhibits [09/17/21]		Dr. John Schaefer [Plaintiffs' Infectious Disease Expert]	May Use Depo Transcript		
200	• Ex. 1. Notice of Deposition					
201	• Ex. 2. CV					
202	• Ex. 3. Expert Report [07/13/21]			Will Use Exhibits		
203	• Article – Osteodiskitis of Lumbar Spine Due to Migrated Fractured Inferior Vena Cava Filter					
<u>CURRICULUM VITAE</u>						
204	Darren Hurst, MD [05/07/21]			May Use		
205	Derek Muehrcke, MD, FACS [07/11/21]			May Use		
206	John C. Schaefer, MD [07/13/21]			May Use		
<u>EXPERTS</u>						
207	Darren Hurst, MD Expert Report [05/07/21]			May Use		
208	Darren Hurst, MD Rebuttal Expert Report [07/11/21]			May Use		
209	Derek Muehrcke, MD, FACS Expert Report [05/11/21]			May Use		
210	Derek Muehrcke, MD, FACS Rebuttal Expert Report [07/15/21]			May Use		
211	John C. Schaefer, MD Expert Report [07/13/21]			May Use		
212	John C. Schaefer, MD Rebuttal Expert Report [10/06/21]			May Use		
<u>MISCELLANEOUS</u>						
213	2022 Becton, Dickinson and Company's [BD] Notice of Annual Meeting and Proxy Statement [01/25/22]			Will Use		
214	BD Made for what's next in Health Annual Report 2021			Will Use		
215	BD Stock Report [08/20/22]			Will Use		
216	BD Investment Detail Report [08/23/22]			Will Use		
217	BD Relative Evaluation			Will Use		
218	BD Top Holders – Security Ownership			Will Use		
219	BD Security Description			Will Use		
220	BD Analyst Recommendations			Will Use		

221	Company News for BD			Will Use		
222	Medical Billing			Will Use		
223	• Community Health					
224	• Einstein Medical Center					
225	• Pottstown Medical Center					
226	• Phoenixville Medical Center					
227	• University of PA					
228	• Penn State Hershey Medical Center					
229	• Geisinger Holy Spirit					
229	Photographs			May Use		
230	Illustrations			May Use		
231	• Women's Anatomy					
232	• Bard Recovery IVC Filter					
233	• Placement of IVC Filter					
233	Blow-ups			May Use		
234	Plaintiff Profile Form		Laura Maietta Wesley Wilson, III	May Use		
235	Plaintiffs' Fact Sheet		Laura Maietta Wesley Wilson, III	May Use		
236	Article/Literature			May Use		
<i>MDL CORPORATE DOCUMENTS</i>						
237	Recovery Filter Migration including: meeting minutes from 2/12/2004; updates from 2/17/2004, 2/19/2004, 2/23/2004, and 2/26/2004; meeting agendas from 2/27/2004, 3/4/2004; Recovery Patient Comparison Matrix; Photos of Specimen & Filter; MedWatch Report; Physician's Progress Notes; Procedure Record; Report of Radiologic Consultation; Preliminary Pathological report; Dr. Brennecke's Initial Pathology Report; Test Protocol: Migration		Expert and Fact Witnesses	Will Use		

	Resistance; Sales Force Communique; Standby Statement, Rev. 2 [MDL Ex. No. 77; Bates: BPV-17-01-00154122 - BPV-17-01-00154189] [03/04/2004]					
238	2/26-2/27/2004 E-mail exchange b/w Hudnall and David Rauch of BPV Re. "Case for Caval Centering" [MDL Ex. No. 545; Bates: BPVE-01-00373887 - BPVE-01-00373887] [02/27/2004]		Expert and Fact Witnesses	Will Use		
239	4/13-4/15/2004 E-mail exchange b/w Lee Lynch, Lehmann, and others Re. "Crisis Plan and Supporting Documents for Your Review" [MDL Ex. No. 546; Bates: BPV-17-01-00165419 - BPV-17-01-00165422] [04/15/2004]		Expert and Fact Witnesses	Will Use		
240	Recovery Internal Q&A, Version 8/30/2004 [MDL Ex. No. 547; Bates: BPVE-01-00033810 - BPVE-01-00033824] [08/30/2004]		Expert and Fact Witnesses	Will Use		
241	9/14/2002 Memo from Thomas Kinst to Recovery Filter Design History File Re. Recovery Filter Compassionate Use, Subject: "Conference call with Bard Peripheral Technologies regarding clinical assessment of Recovery Filter removal #5" [MDL Ex. No. 553; Bates: BPV-17-01-00114165 - BPV-17-01-00114166] [09/14/2002]		Expert and Fact Witnesses	Will Use		
242	12/12/2004 E-mail from Uelmen to Kellee Jones, attaching 12/9/2004 Remedial Action Plan (Revised) SPA-04-12-01 [MDL Ex. No. 854; Bates: BPVE-01-00435295 - BPVE-01-00435303] [12/12/2004]		Expert and Fact Witnesses	Will Use		
243	7/15/2004 E-mail from Hudnall to TPE-Interventional Sales-DG Re. "Vena Cava Filter Complications Q&A" [MDL Ex. No. 898; Bates: BPVE-01-00268921 - BPVE-01-00268923] [07/15/2004]		Expert and Fact Witnesses	Will Use		
244	Draft of Updated Health Hazard Evaluation Memo from Ciavarella to Uelmen, Re: "Limb Fractures of Recovery Filter", dated 7/9/2004. [MDL Ex. No. 900;		Expert and Fact Witnesses	Will Use		

	Bates: BPVE-01-00245369 - BPVE-01-00245373] [07/09/2004]					
245	BPV's 5/6/2008 PowerPoint presentation entitled "Filter Franchise Review", including charts of 2007 U.S. Market Share by \$ and U.S. filter sales history [MDL Ex. No. 932; Bates: BPVE-01-00622862 - BPVE-01-00622900] [05/06/2008]		Expert and Fact Witnesses	Will Use		
246	12/23/2005 E-mail from David Ciavarella Re. "G2 Caudal Migrations", forwarded to Brian Barry on 12/27. Worst case consequence of migrations - accompanied in a majority of tilt cases. Would like to now look at G2 complaints. [MDL Ex. No. 991; Bates: BPVE-01-00028224 - BPVE-01-00028225] [12/27/2005]		Expert and Fact Witnesses	Will Use		
247	8/25/2004 E-mail from Avijit Mukherjee to Robert Carr, Janet Hudnall Cced, Re. "Recovery Filter objective statement", proposing one objective statement for the Recovery Filter G1A project, which Hudnall thought sounded "great" [MDL Ex. No. 1220; Bates: BPVE-01-00008821 - BPVE-01-00008821] [08/25/2004]		Expert and Fact Witnesses	Will Use		
248	Final Bard "Dear Doctor" letter, signed by Janet Hudnall and included in the Information for Use Update for the Recovery Filter System, 12/2004 [MDL Ex. No. 2043; Bates: BPVE-01-00303515 - BPVE-01-00303516] [12/01/2004]		Expert and Fact Witnesses	Will Use		
249	Recovery Timeless Performance Vena Cava Filter Brochure [MDL Ex. No. 2044; Bates: BPV-17-01-00007760 - BPV-17-01-00007763] [01/01/2004]		Expert and Fact Witnesses	Will Use		
250	Document entitled "Failure Investigations/R002 History Review" [MDL Ex. No. 2048; Bates: BPVEFILTER-01-00003802 - BPVEFILTER-01-00003836] [05/09/2007]		Expert and Fact Witnesses	Will Use		

251	Document from Temple University Hospital Risk Management entitled "Review of FDA Manufacturer and User Facility Device Experience Database (MAUDE)" on the Recovery Filter, with data received through 9/30/2004 on migrations of the filter [MDL Ex. No. 2053; Bates: BPVE-01-00526477 - BPVE-01-00526481] [09/30/2004]		Expert and Fact Witnesses	Will Use		
252	4/1/2004 E-mail from Robert Carr to John McDermott and Len DeCant Re. "Recovery GI" [MDL Ex. No. 2067; Bates: BPVE-01-00268911 - BPVE-01-00268913] [04/01/2004]		Expert and Fact Witnesses	Will Use		
253	Health Hazard Evaluation, From Ciavarella To Uelmen, Re: Recovery Filter - Consultant's Report [MDL Ex. No. 4966; Bates: BPVE-01-01019821 - BPVE-01-01019825] [12/17/2004]		Expert and Fact Witnesses	Will Use		
254	HHE of Dr. Ciavarella July 9, 2004 [MDL Ex. No. 5012; Bates: BPV-17-01-00002145 - BPV-17-01-00002145] [07/09/2004]		Expert and Fact Witnesses	Will Use		
255	SPA-04-12-01 - Jan. 4, 2005, Remedial Action Plan [MDL Ex. No. 9792; Bates: BPV-17-01-00154954 - BPV-17-01-00155012] [01/04/2005]		Expert and Fact Witnesses	Will Use		
256	4/1/2002 Recovery IFU 04/02 rev 0 [MDL Ex. No. 55; Bates: BPV-17-01-00042515 - BPV-17-01-00042525] [04/01/2002]		Expert and Fact Witnesses	Will Use		
257	7/18/2005 Bob Scherer to Hudnall re MGH request for IRB study [MDL Ex. No. 287; Bates: BPVE-01-00306646 - BPVE-01-00306649] [07/18/2005]		Expert and Fact Witnesses	Will Use		
258	Curriculum Vitae of Dr. Murray Asch, Radiologist [MDL Ex. No. 548; Bates: BPV-DEP-00002863 - BPV-DEP-00002891] [01/05/2011]		Expert and Fact Witnesses	Will Use		
259	11/13/2002 Live Case Filter Removal, demonstration by Dr. Murray Asch [MDL Ex. No. 550; Bates: BPV-		Expert and Fact Witnesses	Will Use		

	DEP-00002902 - BPV-DEP-00002904] [11/13/2002]					
260	Grassi, et al. 2003 article entitled "Quality Improvement Guidelines for Percutaneous Permanent IVC Filter Placement for the Prevention of Pulmonary Embolism" [MDL Ex. No. 551] [02/01/2001]		Expert and Fact Witnesses	Will Use		
261	5/18/1999 Letter from Thomas Kinst, Product Manager of Filters at NMT Medical, to Monica Coutanche, Marketing Manager at Bard Canada, Inc. [MDL Ex. No. 552; Bates: BPVE-01-00065130 - BPVE-01-00065132] [05/18/1999]		Expert and Fact Witnesses	Will Use		
262	Special 510(k) Submission for the Recovery Filter System, K022236, dated 11/27/2002 [MDL Ex. No. 561; Bates: BPV-TRIAL-EXHIBIT-0293 - BPV-TRIAL-EXHIBIT-0293_0085] [11/27/2002]		Expert and Fact Witnesses	Will Use		
263	3/28/2003 Document RE. "Product Opportunity Appraisal for Recovery Filter", FM070018, Doc No. POA-7081, Version 000 [MDL Ex. No. 766; Bates: BPV-TRIAL-EXHIBIT-0762 - BPV-TRIAL-EXHIBIT-0762_0012] [03/28/2003]		Expert and Fact Witnesses	Will Use		
264	6/9/2004 E-mails Re. "Filter Placement Billing", where Jason Greer asks for the billing codes used for filter placement; Micki Johnson, R.N. provided 7 applicable codes and Carr joked, "I did not see...I82MUCH - Chronic Buffeting" [MDL Ex. No. 842; Bates: BPVE-01-00010846 - BPVE-01-00010849] [06/09/2004]		Expert and Fact Witnesses	Will Use		
265	BPV Engineering Test Report - Effects of Changes to the Recovery Filter and the Femoral Delivery System on Filter Stresses Based on FEA Analysis, Project No. 8027, ETR-05-02-02, Rev 0 [MDL Ex.		Expert and Fact Witnesses	Will Use		

	No. 899; Bates: BPVE-01-00386212 - BPVE-01-00386216]					
266	6/10/2004 E-mail exchange b/w Ciavarella and Cindi Walcott Re. "Recovery Filter/Detachments" [MDL Ex. No. 915; Bates: BPV-DEP-00004807 - BPV-DEP-00004810] [06/10/2004]		Expert and Fact Witnesses	Will Use		
267	Chart of Sales and Adverse Events for all competitors from Q3/00 through Q2/03, according to the MAUDE database. [MDL Ex. No. 922; Bates: BPVEFILTER-01-00010268 - BPVEFILTER-01-00010289]		Expert and Fact Witnesses	Will Use		
268	Updated Health Hazard Evaluation Memo from Ciavarella to Uelmen, Re: "Migration of Recovery Filter" [MDL Ex. No. 930; Bates: BPVE-01-00435698 - BPVE-01-00435701] [06/30/2004]		Expert and Fact Witnesses	Will Use		
269	12/10/2004 E-mail from Marie Swety of Risk Management at Temple University Hospital Re. "FDA Filter Information", forwarding a document she created based on her own investigation of the MAUDE database, specifically pertaining to data received through 9/30/2004 on migrations of the Recovery Filter; forwarded to others, with a message that the trauma service would no longer be using the Bard Recovery filter for their patients; then forwarded to Bard employees, who relayed that "this is not a good situation", as the FDA had now contacted Temple and Dr. Cohen was disappointed that he had not heard from Marketing since this second migration. Doug Uelmen had never before this heard of the FDA contain a physician. [MDL Ex. No. 974; Bates: BPVE-01-00148562 - BPVE-01-00148564] [12/10/2004]		Expert and Fact Witnesses	Will Use		

270	7/16/2005 E-mail from Jason Greer to many Re. "Westy's situation...everyone's situation", detailing Bard's need to respond to Cordis' bringing forward the Maude database to physicians and "causing a problem" [MDL Ex. No. 992; Bates: BPV-DEP-00005665 - BPV-DEP-00005666] [07/16/2005]		Expert and Fact Witnesses	Will Use		
271	12/9/2003 Meeting Minutes Memo from Brian Hudson to Len DeCant, Mike Casanova, Robert Carr, and Alex Tessmer Re. "Special Design Review for Recovery (Project #'s 7081 and 8008)" [MDL Ex. No. 1006; Bates: BPVE-01-00407525 - BPVE-01-00407527] [12/09/2003]		Expert and Fact Witnesses	Will Use		
272	2/13/2004 Meeting Minutes Memo from Doug Uelmen Re. "Filter Migration Meeting Minutes of February 12, 2004" [MDL Ex. No. 1008; Bates: BPV-17-01-00154052 - BPV-17-01-00154059] [02/13/2004]		Expert and Fact Witnesses	Will Use		
273	4/6/2004 Memo from Peter Palermo to Doug Uelmen Re. "Remedial Action Plan - BPV Recovery Nitinol Vena Cava Filter", including the Remedial Action Plan SPA 04-03-01 on the Recovery Filter, dated 3/26/2004 [MDL Ex. No. 1009; Bates: BPV-17-01-00153659 - BPV-17-01-00153666] [04/06/2004]		Expert and Fact Witnesses	Will Use		
274	2/13/2004 E-mail from Mary Edwards Re. "email to sales force", attaching the proposed e-mail communication to the sales force regarding reports of migration and the group's revisions to same via e-mail [MDL Ex. No. 1010; Bates: BPV-17-01-00164702 - BPV-17-01-00164710] [02/13/2004]		Expert and Fact Witnesses	Will Use		
275	Product Assessment Team/Crisis Communications Team Rosters and an outline of the action plans that must take place by this team if the decision is made to recall the Recovery Filter [MDL Ex. No. 1011;		Expert and Fact Witnesses	Will Use		

	Bates: BPVEFILTER-01-00005954 - BPVEFILTER-01-00005956]					
276	3/12/2004 E-mail from Holly Glass to John Lehmann Re. "Recovery Crisis Communications Plan" [MDL Ex. No. 1012] [03/12/2004]		Expert and Fact Witnesses	Will Use		
278	4/16/2004 Memo from Doug Uelmen Re. "Filter Migration Meeting Minutes, April 16, 2004", [MDL Ex. No. 1013; Bates: BPV-17-01-00154730 - BPV-17-01-00154731] [04/16/2004]		Expert and Fact Witnesses	Will Use		
279	6/11/2004 Memo from Pete Palermo to Doug Uelmen Re. "Remedial Action Plan - BPV Recovery Filter - Migration" [MDL Ex. No. 1014; Bates: BPV-17-01-00153581 - BPV-17-01-00153588] [06/11/2004]		Expert and Fact Witnesses	Will Use		
280	Health Hazard Evaluation by John Lehmann on the April 2004 Bard Recovery Filter migration and death, forwarded to Doug Uelmen of BPV on 4/27/2004 [MDL Ex. No. 1015; Bates: BPV-17-01-00153628 - BPV-17-01-00153632] [04/27/2004]		Expert and Fact Witnesses	Will Use		
281	4/23/2004 E-mail from John Lehmann to Carr and Uelmen Re. "Draft data set for statistician" [MDL Ex. No. 1016; Bates: BPVE-01-00415141 - BPVE-01-00415142] [04/23/2004]		Expert and Fact Witnesses	Will Use		
282	5/13/2004 E-mail from John Timko to Hudnall with many CC'ed Re. "Recovery IVC Filter Feedback", providing comments on his initial experience with the retrieval of the Recovery filter, sheath, and cone: significant tilt in at least 30% of his cases, which he believed needed to be addressed, although making changes would increase cost; forwarded by McDermott to DeCant same day as "feedback from the field" [MDL Ex. No. 1017; Bates: BPVE-01-00036095 - BPVE-01-00036096] [05/13/2004]		Expert and Fact Witnesses	Will Use		

283	3/28/2003 Document RE. "Product Opportunity Appraisal for Recovery Filter", FM070018, Doc No. POA-7081, Version 000 [MDL Ex. No. 1053; Bates: BPV-DEP-00002235 - BPV-DEP-00002246] [03/28/2003]		Expert and Fact Witnesses	Will Use		
284	2/19/2004 E-mail from Kellee Jones to many Re. "Update on Recovery Filter Migration & Teleconference 2/20/2004 4:00pm EST", with the "Recovery Filter Migration Update" attached (although attachment not included in exhibit) [MDL Ex. No. 1059; Bates: BPVE-01-00384923 - BPVE-01-00384924] [02/19/2004]		Expert and Fact Witnesses	Will Use		
285	BPV Chart entitled "Recovery Filter Migration Update", dated 2/19/2004 [MDL Ex. No. 1060; Bates: Illegible -] [02/19/2004]		Expert and Fact Witnesses	Will Use		
286	Chart entitled "Recovery Filter Fault Tree Analysis" [MDL Ex. No. 1061]		Expert and Fact Witnesses	Will Use		
287	E-mail from Mary Edwards to many Re. "Recovery Filter" [MDL Ex. No. 1065; Bates: BPVE-01-00009261 - BPVE-01-00009265] [09/09/2004]		Expert and Fact Witnesses	Will Use		
288	BPV Document entitled "Recovery Filter Migration Update, February 17, 2004 [MDL Ex. No. 1078; Bates: BPV-17-01-00154197 - BPV-17-01-00154200] [02/17/2004]		Expert and Fact Witnesses	Will Use		
289	Several memos: (1) 12/8/2004 BPV Memo from John McDermott to Tim Ring and John Weiland Re. "Monthly Global PV Report - November 2004"; (2) 12/8/2005 BPV Memo from John McDermott to Tim Ring and John Weiland Re. "Monthly Global PV Report - November 2005; (3) 2/10/2006 BPV Memo from John McDermott to Tim Ring and John Weiland Re. "Monthly Global PV Report - January 2006; and (4) 2/8/2007 BPV Memo from John McDermott to		Expert and Fact Witnesses	Will Use		

	Tim Ring and John Weiland Re. "Monthly Global PV Report - January 2007 [MDL Ex. No. 1214; Bates: BPVE-01-00152519 - BPVE-01-00152527] [12/08/2004]					
290	Health Hazard Evaluation from David Ciavarella to Gin Schulz Re. "G2 Inferior Vena Cava Filter - Migration" [MDL Ex. No. 1221; Bates: BPVEFILTER-01-00008355 - BPVEFILTER-01-00008357] [02/15/2006]		Expert and Fact Witnesses	Will Use		
291	E-mail from Mary Nielsen to many Re. "Nov.2004 Sales Rankings", Interventional Rankings for November [MDL Ex. No. 1234; Bates: BPVE-01-00391333 - BPVE-01-00391334] [12/21/2004]		Expert and Fact Witnesses	Will Use		
292	E-mail exchange b/w Mickey Graves and Charlie Simpson, FEA on G2, regarding Historical FEA analysis [MDL Ex. No. 1295; Bates: BPVE-01-01225832 - BPVE-01-01225832] [03/23/2006]		Expert and Fact Witnesses	Will Use		
293	E-mail from Mark Tinsley to Jason Greer and Jack Sullivan [MDL Ex. No. 1300; Bates: BPVE-01-00179976 - BPVE-01-00179977] [03/07/2004]		Expert and Fact Witnesses	Will Use		
294	E-mail exchange b/w Hudnall and Bob Cortelezzi Re. "Maude Website Discussion" [MDL Ex. No. 1339; Bates: BPVE-01-00492576 - BPVE-01-00492579] [07/06/2004]		Expert and Fact Witnesses	Will Use		
295	Patient Comparison Matrix for the Recovery Filter Detached Limbs [MDL Ex. No. 1367; Bates: BPV-17-01-00035618 - BPV-17-01-00035639] [11/01/2005]		Expert and Fact Witnesses	Will Use		
296	E-mail from Alex Tessmer to Charlie Benware and Ed Fitzpatrick Re. "Starguide Filter Migration Test Results" [MDL Ex. No. 1369; Bates: BPVE-01-00330122 - BPVE-01-00330122] [03/24/2004]		Expert and Fact Witnesses	Will Use		
297	E-mail exchange b/w Brian Hudson and Janet Hudnall, others CC'ed, Re. "Special Design Review		Expert and Fact Witnesses	Will Use		

	for Recovery - Meeting Minutes". [MDL Ex. No. 1370; Bates: BPVE-01-00407390 - BPVE-01-00407390] [12/11/2003]					
298	BPV Engineering Test Report - Characterization of Recovery Filter Migration Resistance in Comparison to Competitive Product - Phase 1, ETR-04-03-02, Rev 0. [MDL Ex. No. 1383; Bates: BPVE-01-00276094 - BPVE-01-00276106]		Expert and Fact Witnesses	Will Use		
299	Hull and Robertson article entitled "Bard Recovery Filter: Evaluation and Management of Vena Cava Limb Perforation, Fracture, and Migration" [MDL Ex. No. 1433; Bates: BPV-DEP-00001570 - BPV-DEP-00001584] [01/01/2009]		Expert and Fact Witnesses	Will Use		
300	Written notes from the Recovery Filter/Clinical Panel Review with Dr. Kaufman, Dr. Anthony Venbrux, and H. Houstard, Esq. (sp?), detailing issues with thrombus/clots, migration resistance, and radial force [MDL Ex. No 1452; Bates: BPV-17-01-00097817]		Expert and Fact Witnesses	Will Use		
301	Email from Bard's VP of Regulatory Sciences Chris Ganser, to Tim Ring and John Weiland, attached "an executive summary of Recovery Filter adverse events (migration and fracture" [MDL Ex. No. 1580; Bates: BPV-DEP-00021413 - BPV-DEP-00021415] [07/12/2004]		Expert and Fact Witnesses	Will Use		
302	Presentation titled "G2 and G2 X Fracture Analysis, Draft 11/30/08" [MDL Ex. No. 1585; Bates: BPVE-01-00714617 - BPVE-01-00714637] [11/30/2008]		Expert and Fact Witnesses	Will Use		
303	E-mail Exchange b/w Lehmann and Holly Glass Re. "Recovery Crisis Communications Plan" [MDL Ex. No. 1604; Bates: BPVEFILTER-01-00043824 - BPVEFILTER-01-00043824] [03/19/2004]		Expert and Fact Witnesses	Will Use		

304	E-mail from Mike Randall [MDL Ex. No. 1644; Bates: BPVE-01-00617776 - BPVE-01-00617793] [06/23/2008]		Expert and Fact Witnesses	Will Use		
305	E-mail exchange b/w Ganser and Schulz, re: "G2 Perforations" [MDL Ex. No. 1735; Bates: BPVE-01-01510714 - BPVE-1-01510796] [11/14/2005]		Expert and Fact Witnesses	Will Use		
306	Undated Letter from Stacy Taiber, Iowa Territory Manager for BPV, to Brent Adamson, M.D. in NE, introducing herself and the launch of the Bard Recovery Filter System; with highlights [MDL Ex. No. 1775; Bates: BPV-DEP-00055223 - BPV-DEP-00055223]		Expert and Fact Witnesses	Will Use		
307	Chart of Adverse Events and Deaths for all competitors from Prior Evaluation through Q3 2005 and from Q4 2005 to present [MDL Ex. No. 1940; Bates: BPVEFILTER-01-00050487 - BPVEFILTER-01-00050487]		Expert and Fact Witnesses	Will Use		
308	E-mail exchange b/w Gin Schulz and Kellee Jones re Gin, G2 v. Maude and attachments, Spread Sheet - Filter Sales (IMS Q1 '00 to Q4 '04, + Trend Q1 - Q3 '05) [MDL Ex. No. 1941; Bates: BPVE-01-01511164 - BPVE-01-01511165] [11/30/2005]		Expert and Fact Witnesses	Will Use		
309	E-mail from Natalie Wong to Gin Schulz and Candi Long, attaching the PowerPoint Presentation on "Recovery (Gen 1) Fracture Slides" (included in exhibit) and RNF Fracture Report (not included), updated to be current as of 5/18/2006 for the Management Review [MDL Ex. No. 1944; Bates: BPVE-01-01511339 - BPVE-01-01511345] [05/19/2006]		Expert and Fact Witnesses	Will Use		
310	Marketing Brochure - G2 Filter System for Permanent Placement [MDL Ex. No. 2045; Bates:		Expert and Fact Witnesses	Will Use		

	BPV-17-01-00142912 - BPV-17-01-00142915] [01/01/2005]					
311	5/11/2005 "Dear Colleague" letter from BPV, providing an internal analysis of reported adverse events related to the Recovery filter [MDL Ex. No. 2046; Bates: BPV-DEP-00004820 - BPV-DEP-00004831] [05/11/2005]		Expert and Fact Witnesses	Will Use		
312	Updated Health Hazard Evaluation Memo from David Ciavarella, M.D. to Doug Uelmen, Re: "Limb Fractures of Recovery Filter" [MDL Ex. No. 2049; Bates: BPV-17-01-00103875 - BPV-17-01-00103878] [11/17/2004]		Expert and Fact Witnesses	Will Use		
313	E-mail from Alex Tessmer to Robert Carr and Brian Hudson Re. "Filter Migration Test Results [MDL Ex. No. 2063; Bates: BPVE-01-00410985 - BPVE-01-00410994] [02/25/2004]		Expert and Fact Witnesses	Will Use		
314	E-mail Exchange b/w Len DeCant and John McDermott [MDL Ex. No. 2066; Bates: BPVE-01-00009626 - BPVE-01-00009627] [07/27/2004]		Expert and Fact Witnesses	Will Use		
315	E-mail from Alex Tessmer to Robert Carr and Avijit Mukherjee Re. "Corporate Presentations" [MDL Ex. No. 2069; Bates: BPVE-01-00009466 - BPVE-01-00009479] [08/26/2004]		Expert and Fact Witnesses	Will Use		
316	E-mail from Holly Glass to John Lehmann Re. "Recovery Crisis Communications Plan" [MDL Ex. No. 2126; Bates: BPV-17-01-00165436 - BPV-17-01-00165436] [03/12/2004]		Expert and Fact Witnesses	Will Use		
317	Memo from C. Ganser to T. Ring/J. Weiland Re. IVC Recovery Filter Adverse Events (Migrations/Fractures) - Executive Summary, summarizing adverse events of the Bard Recovery filter for migrations and fractures through 8/2/2005		Expert and Fact Witnesses	Will Use		

	[MDL Ex. No. 2148; Bates: BPV-17-01-00097527 - BPV-17-01-00097528] [08/03/2005]					
318	E-mail from Janet Hudnall to John Weiland Re. "Recovery Transition Plan" to replace RF with G2 [MDL Ex. No. 2194; Bates: BPVE-01-00171311 - BPVE-01-00171312] [02/14/2005]		Expert and Fact Witnesses	Will Use		
319	E-mail exchange b/w Rhonda Peck and Hudnall Re. "Forest 0522305" [MDL Ex. No. 2195; Bates: BPVE-01-00338862 - BPVE-01-00338864] [06/06/2005]		Expert and Fact Witnesses	Will Use		
320	E-mail from Natalie Wong to Doug Uelmen Re. "Recovery Stats" [MDL Ex. No. 2253; Bates: BPVE-01-00510097 - BPVE-01-00510101] [05/27/2004]		Expert and Fact Witnesses	Will Use		
321	Complaint File - 02/09/2004, 5104020023; 1305822, Recovery - RF048F, 1395 Migration [MDL Ex. No. 2478; Bates: BPV-COMP-00004516 - BPV-COMP-00004549] [02/09/2004]		Expert and Fact Witnesses	Will Use		
322	Monthly Global PV Report - January 2006 [MDL Ex. No. 4327; Bates: BPVE-01-00719569 - BPVE-01-00719579] [02/10/2006]		Expert and Fact Witnesses	Will Use		
323	Email from: Gin Schulz to Kevin Shifrin regarding Recovery Filter Limb Fractures with attachment of RF Limb detach [MDL Ex. No. 4412; Bates: BPVEFILTER-01-00002447 - BPVEFILTER-01-00002450] [12/19/2005]		Expert and Fact Witnesses	Will Use		
324	2016 Webpage titled Guiding Principles [MDL Ex. No. 4958] [01/01/2016]		Expert and Fact Witnesses	Will Use		
325	E-Mail from Jason Greer to Janet Hudnall, et al. [MDL Ex. No. 4961; Bates: BPVE-01-00374222 - BPVE-01-00374224] [11/13/2004]		Expert and Fact Witnesses	Will Use		
326	E-Mail from Mark Tinsley to Tim Fischer and Janet Hudnall [MDL Ex. No. 4969; Bates: BPVE-01-00177182 - BPVE-01-00177182] [01/20/2005]		Expert and Fact Witnesses	Will Use		

327	Draft Letter from David Ciavarella [MDL Ex. No. 4971; Bates: BPV-DEP-00004802 - BPV-DEP-00004803] [08/18/2005]		Expert and Fact Witnesses	Will Use		
328	E-Mail chain ending with e-mail from Tim Fischer to Cindi Walcott [MDL Ex. No. 4972; Bates: BPVE-01-00529575 - BPVE-01-00529577] [12/15/2004]		Expert and Fact Witnesses	Will Use		
329	E-mail chain ending with e-mail from Scott Hughes to Bob Cortelezzi and Janet Hudnall and accompanying attachment [MDL Ex. No. 4973; Bates: BPVE-01-00179746 -] [07/24/2005]		Expert and Fact Witnesses	Will Use		
330	Complaint Record Detail Report [MDL Ex. No. 4975; Bates: TW_COMPLAINT_000210 - TW_COMPLAINT_000212] [07/16/2004]		Expert and Fact Witnesses	Will Use		
331	Chart of Complaints Reported to Bard [MDL Ex. No. 4976]		Expert and Fact Witnesses	Will Use		
332	Complaint Record Detail Report [MDL Ex. No. 4977; Bates: TW_COMPLAINT_000800 - TW_COMPLAINT_000802] [07/15/2005]		Expert and Fact Witnesses	Will Use		
333	Memorandum, Subject: Monthly Global PV Report - January 2005 [MDL Ex. No. 4980] [02/08/2005]		Expert and Fact Witnesses	Will Use		
334	Memorandum, Subject: Monthly Global PV Report - June 2005 [MDL Ex. No. 4981] [07/12/2005]		Expert and Fact Witnesses	Will Use		
335	E-mail chain ending with e-mail from David Ciavarella to Brian Barry and Christopher Ganser [MDL Ex. No. 4982] [12/27/2005]		Expert and Fact Witnesses	Will Use		
336	Recovery Filter DFMEA 070010, Rev. 2 DFMEA070010 Rev. 2 Recovery Filter DFMEA 070010, Rev. 2 [MDL Ex. No. 5005; Bates: BPV-17-01-00000249 - BPV-17-01-00000262]		Expert and Fact Witnesses	Will Use		
337	SPA-04-04-01 (Remedial Action Plan re RNF Fractures) [MDL Ex. No. 5011; Bates: BPV-17-01-00002137 - BPV-17-01-00002140] [07/12/2004]		Expert and Fact Witnesses	Will Use		

338	R&D Technical Report RNF Migration Study, Design Verification (RD-RPT-100) [MDL Ex. No. 5017; Bates: BPV-17-01-00002650 - BPV-17-01-00002655] [08/05/1999]		Expert and Fact Witnesses	Will Use		
339	Design Review Meeting Minutes Response (From Rob Carr to File) [MDL Ex. No. 5145; Bates: BPV-17-01-00043534 - BPV-17-01-00043535] [01/14/2004]		Expert and Fact Witnesses	Will Use		
340	RNF Meeting Notes RNF Meeting notes [MDL Ex. No. 5229; Bates: BPV-17-01-00073184 - BPV-17-01-00073186] [01/13/1998]		Expert and Fact Witnesses	Will Use		
341	RD-RPT-099 (Recovery Filter EnduraTEC Fatigue Testing Report NMT) [MDL Ex. No. 5234; Bates: BPV-17-01-00084690 - BPV-17-01-00084693] [08/04/1999]		Expert and Fact Witnesses	Will Use		
342	FDA Warning Letter to Bard (unredacted) [MDL Ex. No. 5715; Bates: BPV-17-01-00204231 - BPV-17-01-00204243] [07/13/2015]		Expert and Fact Witnesses	Will Use		
343	Kaufman, 01/04/2017, Exhibit 595 - Written notes from the Recovery Filter/Clinical Panel Review with Dr. Kaufman, Dr. Anthony Venbrux, and H. Houstard, Esq. (sp?), detailing issues with thrombus/clots, migration resistance, and radial force [MDL Ex. No. 1452; Bates: BPV-17-01-00097817 - BPV-17-01-00097817]		Expert and Fact Witnesses	Will Use		
344	Brauer, 08/02/2017, Exhibit 1046 - Bard Simon Nitinol Filter, Postmarket Surveillance Study Amendment, August 10, 2014 [MDL Ex. No. 709; Bates: BPVEFILTER-01-00356101 - BPVEFILTER-01-00356133] [08/10/2014]		Expert and Fact Witnesses	Will Use		
345	Carr Deposition, 11/05/2013 - Exhibit 01 - PowerPoint slide, "An IVC Filter Must..." prevent recurrent PE, maintain patency over time, be easy to		Expert and Fact Witnesses	Will Use		

	use, and avoid complications [MDL Ex. No. 756; Bates: BPVE-01-00498579 - BPVE-01-00498579]					
346	Carr Deposition, 12/19/2014 - Exhibit 05 - NMT Vena Cava Filter Product Line Acquisition Proposal, 07/01/2001 [MDL Ex. No. 787; Bates: BPVE-01-00242737 - BPVE-01-00242742] [07/01/2001]		Expert and Fact Witnesses	Will Use		
347	Ciavarella Deposition, 11/12/2013 - Exhibit 26 - Chart of Sales and Adverse Events for all competitors from 01/00 through Q1 2006, according to the MAUDE database. [MDL Ex. No. 924; Bates: BPVE-01-01631586 - BPVE-01-01631679] [01/01/2006]		Expert and Fact Witnesses	Will Use		
348	Ciavarella Deposition, 11/12/2013 - Exhibit 28 - PowerPoint presentation entitled "Filters Complaint History Data as of 7/31/2007" by Natalie Wong. [MDL Ex. No. 925; Bates: BPV-17-01-00180239 - BPV-17-01-00180239] [07/31/2007]		Expert and Fact Witnesses	Will Use		
349	Cortelezzi, 11/11/2016, Exhibit 571 - 7/18/2005 E-mail from Janet Hudnall to Many Re. Recovery G2 Special Accounts Roadshow", forwarding spreadsheets entitled "Western Region: G1A Recovery 'Discussion' Customer's - PRIORITY ACCOUNTS" and "Western Region: G1A Recovery 'Discussion' Customer's" [MDL Ex. No. 978; Bates: BPVE-01-00177326 - BPVE-01-00177334] [07/18/2005]		Expert and Fact Witnesses	Will Use		
350	Edwards Deposition, 01/20/2014 - Exhibit 08 - 2/13/2004 Memo from Uelmen to Distribution Re. "Filter Migration Meeting Minutes of 2/12/2004" [MDL Ex. No. 1058; Bates: BPV-17-01-00154948 - BPV-17-01-00154952] [02/13/2004]		Expert and Fact Witnesses	Will Use		
351	Ganser Deposition, 10/11/2016 - Exhibit 527 - 4/23/2004 E-mail from John Lehmann to Carr and		Expert and Fact Witnesses	Will Use		

	Uelmen Re. "Draft data set for statistician" [MDL Ex. No. 1217; Bates: BPVE-01-00511127 - BPVE-01-00511130] [04/23/2004]					
352	Ganser Deposition, 10/11/2016 - Exhibit 534 - PowerPoint Presentation for a meeting to analyze EVEREST and MAUDE data and provide justifications for proposed changes to G2 filter [MDL Ex. No. 1222] [01/07/2008]		Expert and Fact Witnesses	Will Use		
353	Hudnall Deposition, 11/01/2013, Exhibit 23 - G2 Brochure (permanent) - Patient Questions & Answers and Bard's website page about G2 Filter System, Indicated for removal, 6/10/2010 [MDL Ex. No. 1337; Bates: BPV-17-01-00137620 - BPV-17-01-00137620] [06/10/2010]		Expert and Fact Witnesses	Will Use		
354	Kessler Report - Email from July 18, 2005, Janet Hudnall stated, "I handed out copies of the lists of accounts that were identified last Spring as 'special needs' accounts that could benefit from being included on the Roadshow...." Attached to this email was a document titled "Western Region: G1A Recovery 'Discussion' Customer's - PRIORITY ACCOUNTS." [MDL Ex. No. 1524; Bates: BPVE-01-00179747 - BPVE-01-00179747] [01/00/1900]		Expert and Fact Witnesses	Will Use		
355	Romney Deposition, 09/07/2016 - Exhibit 2039 3/16/2006 E-mail from Jason Greer to Janet Hudnall [MDL Ex. No. 1912; Bates: BPVE-01-00946624 - BPVE-01-00946625] [03/13/2006]		Expert and Fact Witnesses	Will Use		
356	Schulz Deposition, 01/30/2014 - Exhibit 14 - Draft of the 4/14/2006 Memo from Natalie Wong Re. "RNF Fracture and G2 Caudal Migration update with Brian Barry" [MDL Ex. No. 1943; Bates: BPVE-01-00985047 - BPVE-01-00985048] [04/14/2006]		Expert and Fact Witnesses	Will Use		

357	Wong Deposition, 10/18/2016 - Exhibit 543 - PAT PowerPoint Presentation entitled "G2 Caudal Migration Update," dated 3/2/2006, which Wong circulated via e-mail on 3/2/2006 to several for the presentation that afternoon [MDL Ex. No. 2248; Bates: BPVE-01-00720835 - BPVE-01-00720835] [03/02/2006]		Expert and Fact Witnesses	Will Use		
358	Wong Deposition, 10/18/2016 - Exhibit 545 - BPV's Failure Investigation Report on the G2 Filter - Caudal Migration, FIR-06-01-01, unsigned and forwarded by Wong to Gin Schulz for her review, in anticipation of the Friday deadline [MDL Ex. No. 2250; Bates: BPVE-01-01657056 - BPVE-01-01657071] [07/13/2006]		Expert and Fact Witnesses	Will Use		
359	Ferrera Deposition, 04/07/2017, Exhibit 04 - Clinical Trial results from Murray Asch, MD [MDL Ex. No. 1131]		Expert and Fact Witnesses	Will Use		
360	4/23/2004 Email re filter sales and MAUDE data as of Q1 2004 [MDL Ex. No. 103; Bates: BPV-17-01-00102112 - BPV-17-01-00102112] [01/00/1900]		Expert and Fact Witnesses	Will Use		
361	3/21/2007 Maude data through Q1 2006;email with attachment re AER Q1 2006 and comparative filters [MDL Ex. No. 369; Bates: BPVE-01-00726001 - BPVE-01-00726002]		Expert and Fact Witnesses	Will Use		
362	Complaint File - 08/27/2009, 237752, G2 , 1104 Detachment of component(s) [MDL Ex. No. 3133; Bates: BPV-COMP-00018923]		Expert and Fact Witnesses	Will Use		
363	Hudnall Deposition, 11/01/2013 - Exhibit 33 - 3/2-3/3/2011 E-mail Re. "BARD IVC Filter Event Report"; Email exchange between Ben Haygood and John Worland: No significant difference between the adverse events of the Recovery and Vena Cava		Expert and Fact Witnesses	Will Use		

	filters [MDL Ex. No. 1334; Bates: BPV-DEP-00004967 - BPV-DEP-00004967]					
364	Tessmer Deposition, 06/12/2013 - Exhibit 20 - PowerPoint presentation on the G2 Filter System, for internal use (U.S. only), providing a "Summary of Design Modifications" [MDL Ex. No. 2070; Bates: BPVE-01-00324256 - BPVE-01-00324262]		Expert and Fact Witnesses	Will Use		
365	Little Deposition, 06/27/2016 - Exhibit 2003 - "Patient Questions & Answers" Brochure for the G2 Filter System [MDL Ex. No. 1616; Bates: BPV-17-01-00137624 - BPV-17-01-00137637]		Expert and Fact Witnesses	Will Use		
366	Carr Deposition, 12/19/2014 - Exhibit 01 - NMT Filter Product Line Due Diligence, 9/24/01 [MDL Ex. No. 783; Bates: BPV-17-01-00056704 - BPV-17-01-00056719]		Expert and Fact Witnesses	Will Use		
367	Carr Deposition, 12/19/2014 - Exhibit 14 - RNF Design Animal Verification Study, In-vivo occlusion migration resistance data sheets, Beth Israel Hospital, Animal #511, 11/19/1998 [MDL Ex. No. 796; Bates: BPV-17-01-00031151 - BPV-17-01-00031160]		Expert and Fact Witnesses	Will Use		
368	Carr Deposition, 12/19/2014 - Exhibit 18 - NMT RNF PDT Meeting Notes re Product Development Team, 01/13/1998 [MDL Ex. No. 800; Bates: BPV-17-01-00073184 - BPV-17-01-00073186]		Expert and Fact Witnesses	Will Use		
369	Kaufman, 01/04/2017, Exhibit 602 - Draft version of "A Prospective, Multicenter Evaluation of the Safety Profile of the Bard Recovery Filter" (BPT-0101), with handwritten edits; also includes 11/15/2001 e-mail from Carol Vierling, Re. "RF Protocol and CRFs", forwarding and discussing these changes; also a 12/13/2001 e-mail from Vierling with updated revisions and mention of the statistical section		Expert and Fact Witnesses	Will Use		

	needing work; also includes Check Request and \$10,000 check for same, and e-mails concerning this payment [MDL Ex. No. 1458; Bates: BPV-17-01-00051874 - BPV-17-01-00051874]					
370	Kessler Report - "Starguide.xls" which includes migration resistance testing for the Recovery Filter "manufactured using the current supplier;" [MDL Ex. No. 1492; Bates: BPV-17-01-00153717 - BPV-17-01-00153723]		Expert and Fact Witnesses	Will Use		
371	Vierling Deposition, 05/11/2016 - Exhibit 232 - Check Request and E-mails regarding Remittance Statement in the amount of \$10,000 from Bard to Oregon Health Sciences Foundation, for continuing expenses in support of Dr. John Kaufman. [MDL Ex. No. 2150; Bates: BPV-17-01-00051206 - BPV-17-01-00051210]		Expert and Fact Witnesses	Will Use		
372	Carr Deposition, 10/29/2014 - Exhibit 3A - E-mail exchange b/w Hudnall and others from 3/9-10/4/2005 Re. "Special Accounts Roadshow" [MDL Ex. No. 755; Bates: BPVE-01-00180998 - BPVE-01-00181000]		Expert and Fact Witnesses	Will Use		
373	Vierling Deposition, 05/11/2016 - Exhibit 232 - Check Request and E-mails regarding Remittance Statement in the amount of \$10,000 from Bard to Oregon Health Sciences Foundation, for continuing expenses in support of Dr. John Kaufman. [MDL Ex. No. 2150; Bates: BPV-17-01-00051206 - BPV-17-01-00051210]		Expert and Fact Witnesses	Will Use		
374	Carr Deposition, 10/29/2014 - Exhibit 3A - E-mail exchange b/w Hudnall and others from 3/9-10/4/2005 Re. "Special Accounts Roadshow" [MDL Ex. No. 755; Bates: BPVE-01-00180998 - BPVE-01-00181000]		Expert and Fact Witnesses	Will Use		

	Any and all exhibits listed on the MDL Master Exhibit List, attached hereto as Exhibit 1.			May Use		
SUPPLEMENTAL EXHIBITS						
375	Expert Report of Robert M. McMeeking PhD, NAE, FREng, FRSE, LFASME [03/03/2017]		Dr. Robert McMeeking	Will Use		
376	Expert Report of Robert M. McMeeking PhD, NAE, FREng, FRSE, LFASME [05/11/2017]		Dr. Robert McMeeking	Will Use		
377	Curriculum vitae of Robert M. McMeeking PhD, NAE, FREng, FRSE, LFASME			Will Use		
378	FRE 1006 summary complaint file chart			Will Use		
379	Recovery Filter System, Information for Use, PK5100026 Rev. 01, Labeling Issue Date: 10/03 [BPV-17-01-236633 - BPV-17-01-00236636]			Will Use		
380	Medical Article – 1998 Decousus, et al., A Clinical Trial of Vena Cava Filters In The Prevention of Pulmonary Embolism In Patients with Proximal Deep-Vein Thombosis, New England Journal of Medicine, Vol. 338 No. 7 p. 409-415, [MDL Master Ex. No. 3640]			Will Use		
381	Medical Article - 2015 Mismetti, et al., Effect of a Retrievable Inferior Vena Cava Filter Plus Anticoagulation vs Anticoagulation Alone on Risk of Recurrent Pulmonary Embolism: A Randomized Clinical Trial, JAMA Volume 313, Number 16; 1627-1635 [MDL Master Ex. No. 4147]			Will Use		
382	Medical Article - 2012 Sharifi, et al., Role of IVC Filters in Endovenous Therapy for Deep Venous Thrombosis: The FILTER-PEVI (Filter Implantation to Lower Thromboembolic Risk in Percutaneous Endovenous Intervention) Trial, Cardiovasc Intervent Radiol (2012) 35: 1408-1413 [MDL Master Ex. No. 3939]			Will Use		

383	Medical Article - 2011 Rajasekhar, et al., A Pilot Study on the Randomization of Inferior Vena Cava Filter Placement for Venous Thromboembolism Prophylaxis in High-Risk Trauma Patients, J Trauma 2011; 71: 323-329 [MDL Master Ex. No. 3859]			Will Use		
384	Medical Article - 2015 Hemmila, et al., Prophylactic Inferior Vena Cava Filter Placement Does Not Result in a Survival Benefit for Trauma Patients, Ann Surg (2015); 262: 577-585 [MDL Master Ex. No. 4129]			Will Use		
385	Medical Article - 2017 Rogers, F. B., Cook, et al., Vena Cava Filter Use in Trauma and rates of Pulmonary Embolism, 2003 – 2015, JAMA Surg. 2017;152(8):724-732 [MDL Master Ex. No. 4226]			Will Use		
386	Medical Article - 2010 BPV-17-01-00057953-8037 Nicholson, et al., Prevalence of Fracture and Fragment Embolization of Bard Retrievable Vena Cava Filters and Clinical Implications Including Cardiac Perforation and Tamponade, Arch. Intern. Med. (2010) 170 (20): 1827-1831 [MDL Master Ex. No. 3814]			Will Use		
387	Medical Article - 2012 Nicholson Correction to Article About Prevalence of Fracture and Fragment Embolization of Bard Retrievable Vena Cava Filters, Arch Intern Med/Vol172(No. 2), June 25, 2012 [MDL Master Ex. No.3924]			Will Use		
388	Medical Article - 2016 Bikdeli, Ross, Krumholz, Data Desert for Inferior Vena Caval Filters: Limited Evidence, Supervision, and Research, doi: 10.1001/jamacardio.2016.3764 [MDL Master Ex. No. 4180]			Will Use		

389	Bikdeli B, Systematic review of efficacy and safety of retrievable inferior vena caval filters. Thromb Res. 2018 May; 165:79-82. doi: 10.1016/j.thromres.2018.03.014			Will Use		
390	Bikdeli B, Inferior Vena Cava Filters to Prevent Pulmonary Embolism: Systematic Review and Meta-Analysis, Journal of the American College of Cardiology, Volume 70, Issue 13, 2017, doi: 10.1016.j.jac.2017.07.775			Will Use		
391	Ho K, A Multicenter Trial of Vena Cava Filters in Severely Injured Patients, N Engl J Med 2019; 381:328-337. doi: 10.1056/NEJMoa1806515			Will Use		
	Plaintiffs reserve the right to use any exhibit listed by Defendants					
	Plaintiffs reserve all objections to any exhibit or portion thereof listed by either party. By listing an exhibit, Plaintiffs do not waive any objections. Plaintiffs reserve the right to object depending upon the admission of testimony or other exhibits. Plaintiffs reserve the right to supplement this exhibit list after reviewing Defendants' exhibit.					

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LAURA MAIETTA and
WESLEY WILSON III

Plaintiffs,

vs.

C.R. BARD, INC., a foreign
Corporation, and BARD
PERIPHERAL VASCULAR
INC.

Defendants

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NO: 2:19-CV-04170-MMB

JUDGE: MICHAEL M. BAYLSON

CERTIFICATE OF SERVICE

I hereby certify that on this 26thth day of September 2022, a copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all registered users.

/s/Clifford A. Rieders

Clifford A. Rieders, Esquire PA 20962
Attorney for Plaintiffs